Process of Conducting Research on the Navajo Nation

Introduction

Conducting research on Native American Reservation lands demands a unique protocol that prospective researchers need to understand and respect in order to proceed in an ethical and culturally sensitive manner. First, and foremost, researchers must recognize that they are working on sovereign lands and that cultural and legal issues may be very different than that of their own upbringing and background.

Approval of research proposals will vary depending upon the Tribe or Nation on whose territory the research will be conducted; therefore, researchers must become informed about the requirements in place on their specific Reservation of interest. In some cases, a letter from the Tribal Council may be sufficient. In others, the approval of a tribal Institutional Review Board (IRB) may be required. No research should be conducted based on verbal approval from one individual. The researcher must insure that the appropriate Tribal representative or group has issued approval, in writing, before proceeding with any research activities.

All Research that involves Tribal individuals must incorporate an ‘Informed Consent’ form. Informed Consent should be considered an ongoing process that drives open and honest communication between the researcher and the subject throughout the term of the research. The form should be written in language that is easily understood by the subject to insure that the subject fully understands what he is signing. It must include specific statements covering:

- The volunteer nature of the subject’s participation
- The project purpose
- Selection criteria for subjects
- Duration of subject participation
- Research procedures
- Risks and benefits to the subject
- Confidentiality measures
- Participation Costs and Subject Compensation
- Project Contacts
- Liability

Guidelines and examples of this form can be found at the University of Arizona site: http://www.publichealth.arizona.edu/StudentResources/Documents/HIPAAFAQs.swf/. Other universities have similar sites with Consent Form information. A federal checklist for consent forms can be found at: http://www.hhs.gov/ohrp/humansubjects/assurance/consentckls.htm. Creation and use of an Informed Consent form is a crucial step that must be undertaken prior to engaging Tribal members in research projects that affect individuals.

Navajo Nation

The Navajo Nation has developed a detailed research process; the reservation actually has an Institutional Review Board (IRB), called the Navajo Human Research Review Board. This Board composed a document “IRB Research Protocol Application Guidelines,” which the Board requires all researchers to follow before research is conducted anywhere on the Navajo reservation. Although the Navajo Nation IRB and research process is under the Navajo Division of Health, researchers in project areas other than health must follow these guidelines, if the research involves human subjects, and if these subjects are Navajo Nation tribal members. The following guidelines come directly from the Navajo Human Research Board’s (2007) IRB Research Protocol Application Guidelines.

The table of contents of this application outlines the supporting documents needed for the IRB application. The documents must be organized in the order listed in the table of contents when the researcher submits the application for Any products, services, or organizations that are mentioned, shown, or indirectly implied in this publication do not imply endorsement by The University of Arizona.
review. Not all of the documents are applicable to every project, however, though the researcher will need to contact the appropriate agencies to determine whether all documents will be needed. The Procedural Guidelines for Principal Investigators (a separate document) outlines the phases of the Navajo Nation IRB application. The IRB Research Protocol Application (another separate document) describes each element of the table of contents. The table of contents lists the documents in this order:

A. Cover sheet of the IRB Research Protocol Application (NNHRRB-01)
B. Abstract of the research project
C. Part 1: Community Involvement
D. Part 2: Benefits to the Navajo Nation
E. Part 3: Research Project Description
F. Part 4: Informed Consent Document
G. Part 5: Certification by the Principle Investigator
H. Part 6: Attachments
   a. Curriculum Vitae of the Principal Investigator/Co-Principal Investigator
   b. Approving Resolutions from Agency Councils of the Navajo Nation
   c. Support letters from the CEO's of NAIHS service units and Navajo Nation program directors
   d. Copies of other approved IRB letters(s)
   e. Certificate of confidentiality (if necessary)
   f. OMB clearance document (if necessary)
   g. A copy of the written letter to the Navajo Nation Historical Preservation office (if applicable). Note: All audio or videotaped interviews with individuals or focus groups will need to submit a Class C Permit Application with the Navajo Nation Historical Preservation Office
   h. Budget

Researchers must submit seventeen copies of this research proposal/evaluation to the Navajo Nation IRB Office two months prior to the anticipated date of presentation to the IRB Board. The address for regular and express delivery is:

Attn: Navajo IRB Coordinator
Navajo Division of Health
Window Rock Blvd., Admin. Bldg. #2
P.O. Box 1390
Window Rock, Arizona 86515

Research proposals/evaluations must be submitted in pre-punched 3-hole 8½ x 11 white bonded paper clipped by large binder clips. Each proposal should follow the outline of the table of contents listed above. Each page shall be numbered.

The researcher will need to send a research proposal to the IRB Board chair, along with a letter of interest, and then the chair will send the researcher an application packet and a schedule of the upcoming IRB meetings.

To contact the IRB for additional questions, please call: Beverly Becenti-Pigman, Board Chair
Telephone (928) 871-6650; Fax (928) 871-6259

References


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